

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-CR-20224-BLOOM

UNITED STATES OF AMERICA

v.

**ALAN LI,
a/k/a “Michael Chen,”**

Defendant.

_____ /

**PROTECTIVE ORDER REGULATING DISCLOSURE OF
DISCOVERY AND SENSITIVE INFORMATION CONTAINED THEREIN**

THIS CAUSE is before the Court on the United States of America’s Motion for a Protective Order, ECF No. [22], regulating the disclosure of discovery and sensitive information contained therein to defense counsel in connection with the government’s discovery obligations. The Court finds good cause and it is:

ORDERED AND ADJUDGED that the Motion is **GRANTED**. The government is authorized to disclose sensitive information in its possession that the government believes necessary to comply with the discovery obligations imposed by this Court.

The government shall mark that portion of the discovery that includes sensitive information as “Confidential”.

Counsel of record for the Defendant in this proceeding shall hold the Confidential portion of the discovery in strict confidence. Defense counsel shall restrict access to this discovery, and shall disclose this discovery to their client, office staff, investigators, and to anticipated fact or expert witnesses only to the extent that defense counsel believes is necessary to assist in the defense

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of their client in this matter and in a manner that will prohibit the disclosure of this discovery to other persons not involved in the defense.

Counsel of record for the Defendant shall advise any person to whom the Confidential portion of the discovery is disclosed that such information shall be held in strict confidence, and that further disclosure or dissemination is prohibited without defense counsel's express consent;.

The Defendant shall not maintain any copy of the Confidential portion of the Discovery at the Federal Detention Center or other jail facility without defense counsel present. Should the defendant wish to review any part of the Confidential portion of the Discovery without defense counsel present, upon request the Government shall provide a redacted copy of the particular document(s) requested.

Counsel of record for the Defendant shall obtain a certification from each person to whom the Confidential portion of the discovery is disclosed (excluding the Defendant), in which the recipient, (a) acknowledges these restrictions as set forth in the Protective Order of the Court, and (b) agrees that they will not disclose or disseminate the information without express consent of defense counsel. Counsel shall keep a copy of each certification to identify the individuals who received the Confidential portion of the discovery and the date on which such information was first disclosed.

Counsel of record agree that, upon conclusion of the above captioned case,¹ copies of the Confidential portion of the discovery disclosed to defense counsel pursuant to the terms of this order shall be destroyed or returned to the United States.

¹ The conclusion of the case shall mean the period at the conclusion of any appellate and Section 2255 proceedings, if any, or upon expiration of the deadline for filing appellate or Section 2255 proceedings.

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DONE AND ORDERED in Chambers, at Miami, Florida on August 2, 2022.

A handwritten signature in black ink, appearing to be 'JB' with a long horizontal stroke extending to the right.

BETH BLOOM
UNITED STATES DISTRICT COURT JUDGE

cc: Counsel of record